

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYDIA GARCIA, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEPHEN BERMAN and JOEL BENNETT,

Defendants.

Civil Action No. 1:04-cv-08807-KMK
Electronically Filed

QUANTUM EQUITIES L.L.C., individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

JAKKS PACIFIC, INC., JACK FRIEDMAN,
STEVEN G. BERMAN and JOEL M. BENNETT,

Defendants.

Civil Action No. 1:04-cv-08877-KMK
Electronically Filed

(captions continued on following page)

**NOTICE OF WITHDRAWAL WITHOUT PREJUDICE OF THE MOTION OF QUANTUM
EQUITIES LLC AND FRANK WHITING FOR CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL**

<p>JAMES T. KAHN, on behalf of himself and all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, JOEL BENNETT and STEPHEN BERMAN,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-08910-KMK Electronically Filed</p>
<p>JONCO INVESTORS, LLC, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-09021-KMK Electronically Filed</p>
<p>JAMES IRVINE, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-09078-KMK Electronically Filed</p>

**NOTICE OF WITHDRAWAL WITHOUT PREJUDICE OF THE MOTION OF QUANTUM
EQUITIES LLC AND FRANK WHITING FOR CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF SELECTION OF LEAD COUNSEL**

Quantum Equities LLC and Frank Whiting hereby withdraw their motion for consolidation and for appointment as Lead Plaintiff and approval of their selection of Lead Counsel in light of the Court's order of January 5, 2005. This withdrawal is made without prejudice to the right of

Quantum Equities LLC and Frank Whiting to refile their motion consistent with the order and subsequent proceedings.

DATED: January 24, 2005
New York, NY

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: /s/ Fred Taylor Isquith

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